

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA

VS

THADDEUS CRUMBLY

CRIMINAL DIVISION

CC 201202820

COMMONWEALTH'S
MOTION FOR DISCOVERY

Code: _____

Filed on Behalf of the
Commonwealth of Pennsylvania

Counsel of Record for the
Commonwealth of
Pennsylvania

STEPHEN A. ZAPPALA JR.
DISTRICT ATTORNEY

By

Steven M. Stadtmiller
Deputy District Attorney
PA. I.D. No. 53332

Office of the District Attorney of
Allegheny County
401 Courthouse
Pittsburgh, Pennsylvania 15219

(412) 350-4407

FILED
2012 MAY 29 PM 2:46
DEPT OF COURT RECORDS
CRIMINAL DIVISION
ALLEGHENY COUNTY PA

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MOTION FOR PRETRIAL DISCOVERY AND/OR INSPECTION

TO THE HONORABLE, THE JUDGES OF SAID COURT:

AND NOW, comes the Commonwealth of Pennsylvania by its attorneys, STEPHEN A. ZAPPALA, JR., District Attorney of Allegheny County, and Steven M. Stadtmiller, Deputy District Attorney of Allegheny County, and respectfully represents the following:

1. That on December 7, 2011, a criminal complaint was filed charging the defendant in the above-captioned case with Criminal Homicide, Robbery, Robbery of Motor Vehicle, Person Not to Possess Firearm, Carrying Firearm without License and Criminal Conspiracy;
2. That on May 14, 2012 the Commonwealth provided Discovery materials to defense counsel and made a written request for reciprocal discovery at that time;
3. That the case cited above is currently scheduled for trial before this Honorable Court on June 11, 2012;

4. That the Commonwealth by this motion requests disclosure of the following materials:

- a. Notice of Alibi Defense including specific information as to the place or places where the defendant claims to have been at the time of the alleged offense and the names and addresses of witnesses whom the defendant intends to call in support of such claim;
- b. Notice of Insanity or Mental Infirmary Defense including specific available information as to the nature and extent of the alleged insanity or claim of infirmity, the period of time which the defendant allegedly suffered from such insanity or mental infirmity, and the names and addresses of witnesses, expert or otherwise, whom defendant intends to call at trial to establish such defense;
- c. Results and reports of physical or mental examinations, and of scientific tests or experiments made in connection with the above-captioned case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief, or which were prepared by a witness whom the defendant intends to call at trial;
- d. The names and curricula vitae of any expert witnesses whom the defendant intends to call at trial;
- e. The names and addresses of eyewitnesses to the alleged offense whom the defendant intends to call in his case in chief.

5. That the commonwealth requires those materials requested in paragraph four of the within motion in order to prepare for the prosecution of the above-captioned case.

WHEREFORE, based upon the foregoing, the Commonwealth respectfully requests that this Honorable Court enter an Order requiring disclosure of those materials requested in paragraph four within a reasonable period of time.

Respectfully Submitted,

STEPHEN A. ZAPPALA, JR.
DISTRICT ATTORNEY

BY: 

Steven M. Stadtmiller
Deputy District Attorney

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :

COUNTY OF ALLEGHEY : SS:

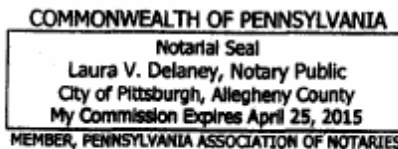
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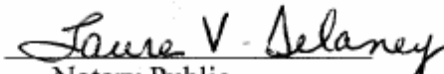
BEFORE ME, the undersigned authority for and in said County and State, personally appeared STEVEN M. STADTMILLER, Deputy District Attorney of Allegheny County, who, being duly sworn according to the law, deposes and says that the statements contained in the foregoing Petition are true and correct to the best of his knowledge, information and belief.


STEVEN M. STADTMILLER
DEPUTY DISTRICT ATTORNEY

SWORN TO and SUBSCRIBED

Before me this 29th day
of May, 2012.




Notary Public

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PRELIMINARY ORDER

AND NOW, to-wit, this ____ day of _____, 2012, it is hereby
ORDERED, ADJUDGED and DECREED that the Commonwealth's
Motion for Pretrial Discovery and/or Inspection filed in the above-
captioned case shall be heard and disposed on the ____ day of
_____, 20__ at ____ (a.m.)(p.m.) before the undersigned.

BY THE COURT:

_____, J.

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ORDER OF THE COURT

AND NOW, to-wit, this ____ day of _____, 2012, it is hereby
ORDERED, ADJUDGED and DECREED that the defendant in the above-
captioned case be and is hereby REQUIRED to disclose those materials
requested in paragraph four of the within Motion for Pretrial Discovery
and/or Inspection on or before the ____ day of _____, 20__.

BY THE COURT:

_____, J.

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of May, 2012, a true and correct copy of the within Motion has been served by U. S. Mail, to:

Wendy Williams, Esquire
437 Grant Street, Suite 417
Pittsburgh, PA 15219

The Honorable Beth A. Lazzara
Fifth Floor
Allegheny County Courthouse
Pittsburgh, PA 15219

Helen M. Lynch, Esquire
Court Administrator
Room 535 Courthouse
Pittsburgh, PA 15219


STEVEN M. STADTMILLER
DEPUTY DISTRICT ATTORNEY